

'LAND TO THE EAST OF THE ROUNDINGS' AND 'LAND WEST OF LONDON ROAD', HERTFORD HEATH

REVIEW OF BIODIVERSITY NET GAIN POTENTIAL



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1.0 INTRODUCTION

- 1.1** This Report has been prepared by Chartered Landscape Architects at Pegasus Group, working alongside specialist Ecology consultancy BSG Ecology. The Report sets out the findings of an analysis which has been undertaken of the potential for two proposed residential development sites in the Hertford Heath Neighbourhood Plan Area to deliver net gains to biodiversity.
- 1.2** The first site is known as 'Land to the East of the Roundings'. This site currently forms the proposed location to meet the identified housing need for Hertford Heath up to 2033 in full, in the emerging Hertford Heath Neighbourhood Plan.
- 1.3** The second site is known as 'Land West of London Road'. This site is being promoted as an alternative location in which to deliver the full extent of the identified housing need for Hertford Heath.
- 1.4** The Report uses all available evidence regarding the two sites and an established assessment methodology in order to present observations regarding the relative biodiversity net gains potential of each site. A clear conclusion is then provided regarding which of the two sites has the potential to deliver the biodiversity benefits required by the emerging national and Neighbourhood Plan policies.

2.0 POLICY CONTEXT

Biodiversity Net Gain

- 2.1** The UK Government published the 25 Year Environment Plan in January 2018. This included a Policy of '***Embedding an 'environmental net gain' principle for development including housing and infrastructure***', stating that '***current policy is that the planning system should provide biodiversity net gains where possible. We will explore strengthening this requirement for planning authorities to ensure environmental net gains across their areas, and will consult on making this mandatory***'.

- 2.2 The 'Draft Environment (Principles and Governance) Bill' was then published in December 2018 and an update to this was provided in July 2019. It is understood that the Government intend to legislate on a requirement for mandatory biodiversity net gain for residential development projects when the Environment Bill is adopted into law.

Emerging Hertford Heath Neighbourhood Plan

- 2.3 The Hertford Heath Neighbourhood Plan will be a document containing planning policies to guide development in Hertford Heath from 2017-2033. It will include proposals for development and policies that project and protect what residents feel are the most important things about their area. The policies in the plan must not conflict with policies in the new East Herts District Plan, 2018.
- 2.4 The District Council requires Hertford Heath Neighbourhood Plan to put forward possible sites for future development. As such, as part of the Plan process a 'Call for Sites' exercise took place in order to seek to identify possible sites within Hertford Heath Parish for future development.
- 2.5 A Draft Policies document was prepared in March 2019, this included the following draft Policy concerning Biodiversity matters:

'POLICY HH-EH4: Conserve and Enhance Biodiversity

Development should conserve and enhance biodiversity and deliver net gains to biodiversity. Wildlife and significant habitats including Hertford Heath Site of Special Scientific Interest (SSSI) sites and numerous local wildlife sites will be protected from any harmful impacts of development. In particular the following designated local wildlife sites, as shown on the Policies Map (Appendix Y) and described in an inventory in Appendix W, will be protected and managed:

***• Balls Wood • Much Wood and Leafy Oak Wood • Hobbyhorse Wood
• Meadows east of Balls Wood • Goldings Wood • Goldings Wood Pasture • High Wood • Wet meadow near Mount Pleasant • Dells Wood • Hailey Wood'***

- 2.6** A draft Policy was also included in relation to the site at Land to the East of the Roundings (also referred to as 'Land to West of London Road Opposite Haileybury College'), where it is proposed to meet the identified housing need for Hertford Heath up to 2033 in full, as follows:

POLICY HH-HI3: Land to West of London Road Opposite Haileybury College

Location	To west of London Road opposite Haileybury College and east of The Roundings
Plot Size	3.11 hectares
Existing Use	Mixed use (housing, gardens and meadow)
Development Capacity	A minimum of 80 homes
Score	2.42 Scale of 0 to 4 where 4 is the best and 0 is the worst

The development of this site will be supported provided that it fulfils the policies in the plan and it meets the following criteria...

- 2.7** It is therefore clearly identified that the proposals at 'Land to the East of the Roundings' would need to comply with the requirements of all the other policies in the Neighbourhood Plan. This would include draft Policy HH-EH4 in relation to Biodiversity matters and therefore in order for the scheme to be policy compliant it would need to '***deliver net gains to biodiversity***'.

3.0 OVERVIEW OF THE PROPOSED RESIDENTIAL DEVELOPMENT SITES

Land to the East of the Roundings

- 3.1** The site known as 'Land to the East of the Roundings, Hertford Heath' (also referred to as 'Land to West of London Road Opposite Haileybury College') was put forward during the Neighbourhood Plan Call for Sites process and is currently the proposed site to deliver the required housing need. The site comprises a total of 3.19 hectares currently comprised of a mixture of improved grassland, semi-improved grassland, scrub and residential gardens.
- 3.2** A report was prepared in April 2019 (**Appendix 2**), which accompanied a proposed masterplan for 84 dwellings at the site (**Appendix 3**), the delivery of which would require several existing houses in The Roundings to be demolished as part of the proposal. When this masterplan is reviewed it is clear that there are very limited areas shown where biodiversity gains could be provided within the site. This matter is considered in detail in Section 5.
- 3.3** It is important to recognise that wherever possible, net gains to biodiversity should be delivered within a proposed development site and not within any wider landholding.

Land West of London Road, Hertford Heath

- 3.4** A site at 'Land West of London Road', Hertford Heath is also being promoted as an alternative to the site at 'Land to the East of the Roundings'. This site comprises 5.53 hectares of primarily improved grassland, currently managed for agricultural crop.

3.5 An indicative layout of 84 dwellings has also been prepared for this site (**Appendix 4**). This layout includes for a notable area of undeveloped land within the site boundary which it is understood could be utilised to provide biodiversity gains. This matter is considered in detail in Section 4.

4.0 METHODOLOGY

4.1 The review of biodiversity potential has been undertaken in line with the UK Government Department of Environment, Food and Rural Affairs (Defra) Biodiversity Metric 2.0.

4.2 The metric uses habitat features as a proxy measure for capturing the value and importance of biodiversity. It is in the form of a MSEXcel spreadsheet that calculates the biodiversity value of a site before and after development based on habitat features and accounting for their size, ecological condition, location and proximity to nearby 'connecting' features.

4.3 Further details of the approach and methodology used are provided in the BSG Ecology – Biodiversity Net Gain Assessment Report, included at **Appendix 1**.

5.0 REVIEW OF BIODIVERSITY NET GAIN POTENTIAL

Land to the East of the Roundings

5.1 The full appraisal at Appendix 1 identifies a relatively high baseline biodiversity value for this site. It also notes that its small size results in little wildlife habitat being able to be delivered on-site post-development.

5.2 The result is that, when taking the most likely evaluation of the habitats present on-site before development, the biodiversity outcome post-development for this site is: a habitat based biodiversity net loss of 63.4%.

Potential Offsite Provision

- 5.3** The principles and practice of the operation of the Defra Metric 2.0 gives policy support to the idea that there is a hierarchy of where biodiversity gain should be sought, as follows: on-site > locally off-site > distant off-site.
- 5.4** The detail of the operation of the Defra Metric 2.0 is described in the 'User Guide' (Crosher et al., 2019a). Paragraph 2.7 of this states "*The metric incentivises delivery that is on or close to the impact site*". It also describes as a 'Principle' on page 19 that "*Principle 7: Compensation habitats should seek, where practical, to be local to the impact.*" As such, wherever possible, net gains to biodiversity should be delivered within a proposed development site and not on a wider landholding.

Land West of London Road, Hertford Heath

- 5.5** The full appraisal at Appendix 1 sets out that the baseline biodiversity value of this site has been identified as lower than the site at 'Land to the East of the Roundings'. In addition, it is noted that the site is larger and so able to accommodate more wildlife habitat on-site post-development for the same housing delivery. This includes:
- *The creation of a flower rich meadow grassland.*
 - *The creation of marshy grassland around the flood attenuation feature.*
 - *The creation of an open water flood attenuation feature.*
 - *Amenity grassland in the public realm adjacent to the dwellings.*
 - *The planting of street trees.*
 - *The planting of native hedgerow.*
- 5.6** The result is that, when taking the most likely evaluation of the habitats present on-site before development, the biodiversity outcome post-development for this site is: a habitat based biodiversity net gain of 76.4%.

6.0 SUMMARY AND CONCLUSIONS

- 6.1** Having undertaken an appraisal of the 'Land to the East of the Roundings' proposals which are currently favoured in the emerging Neighbourhood Plan the current evidence base suggest that the scheme would result in a habitat biodiversity net loss of 63.4%. As such, the site would not appear to meet the clear policy test set out in Policy 'HH-EH4' of the Neighbourhood Plan.
- 6.2** By contrast the alternative site at 'Land West of London Road' is larger and so able to deliver more wildlife habitat on site. This site also has a lower existing biodiversity value than the currently preferred scheme due to its use as agricultural field, which provides more scope for improvements to be secured. As such, the current evidence base suggest that the proposals for this site would result in a habitat biodiversity net gain of 76.4%.
- 6.3** As such, there is clear evidence that site at 'Land to the East of the Roundings', which is currently favoured in the emerging Neighbourhood Plan, would not be compliant with the emerging policy through its failure to deliver onsite biodiversity gains. By contrast, the alternative site at Land West of London Road could provide substantive onsite biodiversity benefits and would be compliant with the policy test set out.

APPENDIX 1 – BSG ECOLOGY REPORT

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